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**From:** Rate, Debra [Rate.Debra@epa.gov]  
**Sent:** 9/9/2020 3:22:04 PM  
**To:** Johnson, Marion [Johnson.Marion@epa.gov]  
**Subject:** RE: Aldicarb Status and Renegotiation Pursuit

Thank you, Marion!

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**From:** Johnson, Marion <Johnson.Marion@epa.gov>  
**Sent:** Wednesday, September 09, 2020 9:12 AM  
**To:** Echeverria, Marietta <Echeverria.Marietta@epa.gov>  
**Cc:** Aubee, Catherine <Aubee.Catherine@epa.gov>; Rosenblatt, Daniel <Rosenblatt.Dan@epa.gov>; Adeeb, Shanta <Adeeb.Shanta@epa.gov>; Rate, Debra <Rate.Debra@epa.gov>  
**Subject:** Aldicarb Status and Renegotiation Pursuit  
**Importance:** High

Marietta,

Good morning! The RD/IO and BCs have been so preoccupied in the last few weeks, that I haven't provided you with the most recent update on aldicarb since my last general over a week ago. As you know, we left my general agreeing that we would proceed with asking EFED/ERB2 to conduct the PCA analysis to get a more refined assessment of the surface water contribution. In the discussion last week with the aldicarb team, EFED extended the time that they would need to be trained and to conduct the refined assessment, which moved their target date from late October to somewhere around March, 2021.

Given the proposed time for EFED to conduct their refined assessment, we have moved forward with discussions with the registrant to renegotiate the current due date of September 14, 2020 (i.e., next Monday). In that we feel the registrant will react negatively to a proposed renegotiation date for another six months, we opted to propose three to four months, citing that the agency currently is not able to make the safety finding, but requires additional time in an attempt to refine the surface water numbers using an unconventional approach. At this point, we are awaiting a response from the registrant.

In the meantime, EFED has asked whether it's desirable for them to run the current numbers (i.e., without refinement), until which time they can conduct the more aggressive modeling approach. While we don't want to unnecessarily burden EFED's resources, I do feel that having both water assessments would be beneficial, if nothing more than to add more clarity to the discussion, as we anticipate additional briefings up the chain.

That said, are you supportive of the team asking EFED to run the current numbers and having them also proceed with the more refined approach to be concluded over the next 3 to 6 months? Additionally, do you think that existing capacities in EFED would allow for some other entity (e.g., Mark Corbin, et.al.) to actually conduct the refined PCA approach to assist in speeding up the process? Finally, if you agree with other EFED resources possibly taking a stab at conducting the refined analysis, would it be reasonable for IVB2 to schedule a session to include EFED and RD senior management to discuss such a proposal, or would you prefer talking with Jan about the possibilities in a more informal manner?

Please let us know your thoughts as soon as possible, and many thanks for your time!

Regards,

Marion J.

Marion J. Johnson, Jr.  
Chief, Invertebrate-Vertebrate Branch 2

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